

GREENWICH N.V.

Responsible Gaming Policy

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1. GENERAL

1.1. Introduction

This Policy sets out the responsible gaming rules and procedures that Greenwich N.V. (the “Company”) follows when engaging with our customers. As a gambling operator licensed by the Curacao Gaming Authority (CGA), the Company is fully committed to fostering a safe, transparent, and responsible gaming environment for all players.

This Responsible Gaming Policy aligns with the CGA’s standards and the National Ordinance on Games of Chance (LOK). We recognize the risk of problem gambling and addiction inherent in any offering of games of chance and aim to ensure that gambling remains an enjoyable form of entertainment and is not a source of harm.

1.2. Objective

The objective of this Policy is to create a safe, fair, and enjoyable gaming environment for all our customers. We aim to prevent and minimize the potential negative impacts of gambling, protect vulnerable individuals, promote responsible gaming practices, and ensure compliance with the applicable regulation set forth by the Curacao Gaming Authority.

1.3. Scope

This Policy applies to the Company, with regard to all its business activities regulated and licensed by the CGA.

The procedures and principles set out herein must be followed at all times by the Company’s directors, officers, employees, agents, and assignees. In particular, this Policy applies to all employees, contractors, outsourced staff involved in the Company’s gaming operations, including but not limited to customer support teams, marketing personnel, payment service team, affiliate managers, senior management, and third parties engaged by the Company in any player interaction and support activities.

The Company’s Responsible Gaming Policy forms an integral part of its overall compliance framework and is aligned with broader obligations concerning anti-money laundering, customer protection, data privacy, fraud prevention, and ethical operations.

The Company has designated a Compliance (RG) Officer to act as the Responsible Gaming Officer to oversee the implementation and monitoring of this policy. This officer shall submit an internal Responsible Gaming report at least once per year to Executive Management, evaluating policy effectiveness and recommending improvements. All significant updates to this policy must be reported to the CGA.

The company also implements effective safeguards to protect vulnerable persons and mitigate the risk of problem gambling. This includes:

- Clear internal policies and procedures to promote responsible play
- Easy-to-access Responsible Gaming tools and educational materials
- Monitoring systems to identify and address problematic gambling behavior
- Full compliance with CGA reporting and audit obligations

1.4. Responsible Gaming Strategy

Our responsible gaming strategy is based on these key points, as further described in this Policy below:

- Understanding nature and signs of problem gambling
- Providing Information and RG tools to our customers
- Detecting problem gambling and intervening to prevent further harm
- Upholding Self-Exclusion
- Adhering to responsible gaming standards in our marketing and advertising activities
- Providing training for our staff and our contractors to ensure compliance with this Policy, in particular with regards to recognizing potential problem gambling

1.5. Definitions

Term	Definition
“Company”	means Greenwich N.V.
“CGA”	means Curacao Gaming Authority, gaming regulatory body which licenses and regulates online casinos
“Games of Chance”	means any game in which one or more players, in exchange for the payment of money or monetary value, compete for prizes in the form of money or monetary value, and the outcome of which is determined either by chance only or by a combination of chance and players’ insight or skill, with no possibility for players to significantly influence the outcome, including sports betting and poker
“LOK”	is the National Ordinance on Games of Chance law of Curacao
“Marketing, promotion and advertising”	refer to all resources, messages and media that promote the operator’s domain(s), brand(s), products, or services. This includes but is not limited to print and other media advertising content marketing, digital marketing, and social media campaigns

Term	Definition
“Responsible Gaming”	gambling in a way that minimizes the potential negative effects that gambling can have on individuals and society. This includes recognizing and managing the risks associated with gambling, as well as promoting safe and healthy gambling practices
“Self-exclusion”	is an event where a player voluntarily bars themselves from all or certain online gaming-related activities with a specific operator. That self-exclusion should apply across all domains and brands operated by the same operator
“Vulnerable Person”	is defined as a person who: 1. Under eighteen years of age. 2. Has no, or insufficient, control over his or her gambling behavior, because of which he or she is, or threatens to become, addicted to one or more Games of Chance and, as a result, may cause harm to himself or herself or to other people. 3. Has been banned from playing any Game of Chance either on the Company’s initiative or at his or her own request. 4. Has been declared bankrupt.

1.6. Policy Review and Updates

This Responsible Gaming Policy will be reviewed annually and updated as necessary to ensure it remains effective and aligned with industry best practices and regulatory requirements.

Any changes made to this policy as a result of the review process will be:

- Clearly documented and version-controlled
- Communicated to all relevant stakeholders, including employees, agents, and third-party partners
- Submitted to the CGA for review and approval
- Implemented across all relevant business processes and systems

2. PROBLEM GAMBLING

2.1. Concept

Problem gambling is defined as gambling behavior that creates negative consequences for the gambler, others in their social network, or for the community. It is characterized by difficulties in limiting money and/or time spent on gambling, which leads to adverse outcomes for the individual, others, or the community.

2.2. Reasons and Stages of Problem Gambling

Problem gambling often develops gradually and can be influenced by various factors:

Reasons: - Psychological factors (e.g., stress, depression, anxiety) - Biological factors (e.g., genetic predisposition) - Social and environmental factors (e.g., peer pressure, easy access to gambling) - Financial motivations (e.g., desire to solve money problems).

Stages: - The Winning Phase: Initial big wins can create a false sense of control and skill - The Losing Phase: Losses begin to mount, leading to increased gambling to recoup losses - The Desperation Phase: Gambling becomes a primary focus, often leading to illegal activities to fund the habit - The Hopeless Phase: The individual feels powerless to stop gambling despite severe negative consequences.

2.3. Typical Behavior of Problematic Gamblers

Problematic gamblers often exhibit the following behaviors:

- Inability to stop or control gambling
- Gambling to escape problems or negative emotions
- Lying about or hiding gambling activities
- Jeopardizing relationships, employment, or education
- Chasing losses and increasing time/money spent on gambling
- Relying on others for financial support due to gambling losses
- Feeling anxious or irritable when trying to stop

2.4. Signs of Problem Gambling

Warning signs may include:

- Frequent failed deposit attempts
- Sudden spikes in deposit size or gambling duration

- Requests to raise limits
- Extended play sessions without breaks
- Mentioning borrowing money to gamble
- Multiple self-exclusion attempts or account reactivations
- Creating duplicate accounts to bypass limits
- Admitting gambling is affecting personal or professional life

This Policy details the tools and practices we use to keep our customers informed of the risks associated with problem gambling and to safeguard our customers from those risks.

3. AGE VERIFICATION

3.1. Age Verification Requirements

As part of our commitment to Responsible Gaming and regulatory compliance under the CGA, we maintain strict measures to prevent underage gambling and ensure that only individuals who are 18 years or older can access our services.

Age verification measures include:

- Mandatory Date of Birth entry at registration
- A declaration of legal age via tick box at registration
- Verification of customer's identity prior to (in case of valid suspicion) or upon reaching AML/KYC thresholds
- Immediate account restriction and investigation if there is any doubt regarding a player's age, followed by an appropriate document-based verification.

Age verification shall be performed in line with the Company's AML / KYC policies and procedures and shall at a minimum include a government-issued valid ID check (such as a passport, national ID, or driver's license). If necessary, secondary verification methods, such as proof of address, selfie verification, or third-party database checks, shall be employed.

Should it be determined that a player is underage, or if we have reasonable suspicion to believe that an individual is not of legal gambling age:

- The account will be immediately blocked
- Any funds deposited by the underage individual (except those frozen under AML obligations) will be returned
- All winnings will be forfeited in accordance with our terms and regulatory guidelines
- The reason for account closure will be clearly communicated to the individual

All age verification actions, attempts and outcomes are documented and securely stored and will be made available for review upon request by the CGA or other competent authorities.

3.2. Parental Control and Internet Filtering Tools

The Company is committed to preventing underage access to its gaming platform and recognizes the shared responsibility between it and adult users in maintaining a secure and age-appropriate environment.

To this end, the Company strongly advises all adult users to take active precautions when sharing internet-enabled devices with minors. These measures include

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safeguarding usernames, passwords, and stored payment details, and ensuring that accounts are not left logged in when unattended.

As an additional protective measure, the Company encourages the use of trusted third-party parental control and internet filtering software to restrict access to gambling-related content on shared or household devices. The following tools are commonly used and widely available:

- **Net Nanny** – www.netnanny.com
- **GamBlock** – www.gamblock.com
- **CyberSitter** – www.cybersitter.com

This information is provided to all customers via the Responsible Gaming page of each of the Company's brands, available to both registered customers and unregistered visitors.

4. PLAYER INFORMATION AND ACCESSIBILITY

The Company ensures that sufficient information is provided throughout our brands and application interfaces to enable customers to make informed choices and take immediate action when necessary.

4.1. Homepage Accessibility

The Company shall maintain a Responsible Gaming page which implements this Policy in a player-friendly manner and language, providing materially parallel information and procedures as contained in this Policy. Sections of evidently internal nature, as well as those that may negatively impact players, will be omitted. By way of example, providing players with information on metrics used by the Company to determine the RG risk of a player may allow them to tailor their responses and actions and to conceal their problem from the Company – an appropriate self-assessment test should be published instead.

A clear and visible link to the Responsible Gaming page shall be present on the homepage and accessible from relevant pages of the website or application interface.

The Responsible Gaming page must be made available in English and the language of the target market

Players are provided with direct access to Responsible Gaming tools that allow them to manage their gaming behavior including, but not limited to, self-exclusion, cooling-off period, limit setting and other responsible gaming measures.

The homepage shall display clear information on how players can contact the operator regarding responsible gaming concerns via email.

4.2. Terms & Conditions Inclusion

- The Responsible Gaming page must be explicitly referenced and relevant information included within the Terms & Conditions of the website
- The Terms and Conditions must be no more than one click away from the homepage of the website
- Players must be informed about the responsible gaming tools available, their functionality, and how they can be used

4.3. Footer Information

The footer of the website must contain the following essential details:

- A clear visual indication that under-age gambling is prohibited

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- The name and registered address of the Company
- The official license number issued by the Curacao Gaming Authority
- A statement confirming the regulatory oversight of the Company's operations by the Curacao Gaming Authority
- A link to the Responsible Gaming page (including the policy statement)
- The CGA digital seal referencing the Company
- A link to gambling addiction support resources, including for example international support sites, such as Gamcare, Gamblers Anonymous, Gambleaware, and local support sites (where available) in the markets that the Company targets.

5. PLAYER SELF-ASSESSMENT

5.1. Access to Gambling History

Players shall be able to access a detailed record of their betting and wagering history, including timestamps of transactions from the relevant section of their player account page, from the date the account was opened. This data must include:

- Bet and wager history
- Deposit and withdrawal records
- Timestamps and frequency of gameplay
- Win/loss history

This data is to be accessible from within the player account interface and available for review at any time. Such transparency allows players to reflect on their habits and detect any emerging patterns of concern.

5.2. Self-Assessment Tools

Players are encouraged to regularly assess their gaming habits to determine whether their gambling remains within healthy limits by providing self-assessment tools that allow them to answer a series of questions designed to help identify potential problem gambling behaviors.

5.2.1. Comprehensive test

The Company provides and encourages the use of voluntary self-assessment tools designed to help players evaluate whether their gambling remains recreational or shows signs of potential risk. These tools are integrated into the Responsible Gaming section of the website.

The Company will link on the Responsible Gaming page the common 20 question quiz that is published on the Gamblers Anonymous website: <https://gamblersanonymous.org/20-questions/>

The Company may develop additional or alternative scientifically recognized tests, based on the actual operational data and statistics.

5.2.2. CAGE Test

In an ongoing communication with the players (such as live chat) the Company's first-line staff shall, where appropriate, use the short 4-question CAGE Questionnaire (Adapted for Gambling).

- **C – Cut Down:** Have you ever felt you should cut down on your gambling?
- **A – Annoyed:** Have people annoyed you by criticizing your gambling habits?
- **G – Guilty:** Have you ever felt guilty about your gambling?
- **E – Eye-Opener:** Have you ever had a morning "eye-opener" to steady your nerves or recover from gambling losses?

Interpreting the Results:

- **0 Yes Answers:** Low risk for gambling problems.
- **1 Yes Answer:** Moderate risk; further assessment may be needed.
- **2 or More Yes Answers:** High risk; further evaluation and intervention are strongly recommended.

5.2.3. Follow-up

Players who identify signs of problematic gambling through these self-assessments will be:

- Encouraged to use available Responsible Gaming tools, including deposit limits, time-outs, self-exclusion, and reality checks
- Provided with access to support resources and professional help services
- Given the opportunity to contact the Customer Support Team for assistance in applying further protective measures

The Company commits to maintaining confidentiality and sensitivity when responding to players who indicate potential issues through self-assessment.

6. RISK IDENTIFICATION AND INTERVENTION

In accordance with the CGA regulatory framework and Article 1.4(e) of the LOK, which prohibits allowing vulnerable persons to participate in gambling, the Company is committed to actively monitoring player behavior to detect early signs of problematic or harmful gambling patterns.

6.1. Active Behavioral Monitoring

Behavior tracking involves continuous analysis of player activity to identify potential risk indicators.

Monitoring is conducted through trained first- and second-line personnel, who engage directly with players:

- Customer Support personnel and VIP Managers are trained to recognize and react to the signs of problem gaming in their day-to-day interaction with the players.
- Risk managers perform checks of the player's behavior on each iteration of account review, as may be triggered by KYC-related flags and thresholds, internal reports by the first-line personnel or the automated analytical systems.

The Company will consider implementing automated or semiautomated systems to analyze its playerbase and raise appropriate flags related to problematic gambling and risk indicators. These may also include tools based on such emerging technologies as AI- or ML-driven screening.

This layered monitoring enables real-time detection of patterns that may suggest developing or existing gambling issues.

6.2. Key Indicators of Risk

The Company monitors multiple signs of potential gaming problems and fine-tunes the applied monitoring settings based on real player-base data. The behaviors subject to monitoring may include, without limitation:

- Deposit and wagering frequency – sudden increases or erratic deposit, wagering or gaming session patterns
- Use of multiple payment methods – particularly attempts to bypass limits
- Reversed withdrawals – multiple cancelled cash-out attempts
- Extended play sessions – prolonged gaming without breaks
- Increased communication with customer support – including requests for bonuses or signs of agitation

- Frequent changes to responsible gaming tools – such as continuously increasing deposit or loss limits or repeatedly making use of cooling-off period
- Players under 25 years old spending substantial amounts, particularly on casino or virtual games
- Players maxing out a credit card and attempting to register additional cards.
- Unrealistic spending patterns – inconsistent with known demographic information
- Account circumvention attempts – including multiple account creation or limit avoidance

These patterns are evaluated in context to determine whether escalation is required.

6.3. Procedures for Player Identification and Intervention

The Company maintains a documented, step-by-step process for the identification and handling of risky behavior:

6.3.1. Player Profiling and Risk Assessment:

- Establish player risk profiles using internal data and behavioral triggers
- Alerts must be generated for any activity outside predefined safe parameters

6.3.2. Direct Player Contact:

- When concerning behavior is detected first-line personnel must engage the player directly with additional questions and/or recommendations, as appropriate to the particular situation at hand
- In cases of elevated risk or complexity, the player must be reported to the RG risk managers for further analysis and intervention
- All interactions must be documented, noting concerns raised and any actions taken, in the back-office / control software system

6.3.3. Intervention Measures:

Depending on the severity of risk, the following actions may be taken:

- Promotion of Responsible Gaming tools (limits, self-assessment, time-outs)
- Enforcement of Responsible Gaming tools
- Temporary restrictions or cooling-off periods
- Permanent exclusion in cases of significant harm

- Referral to external support services

All measures must be proportionate to the behavior identified and applied in line with internal escalation protocols.

6.4. Training and Staff Readiness

All relevant staff must undergo regular training to:

- Identify early warning signs of gambling harm (e.g., emotional distress, erratic play)
- Communicate with at-risk players professionally and empathetically
- Guide players to Responsible Gaming tools and external support services
- Escalate cases appropriately within the Company
- Appropriately document the actions taken in the back-office / control software system

Training must be documented, reviewed periodically, and adapted to reflect evolving best practices and regulatory requirements.

7. RG TOOLS - EXCLUSIONS

7.1. Cooling-Off

The Company is committed to supporting Responsible Gaming and enabling players to exercise greater control over their gaming activity. In accordance with CGA regulatory expectations, the Company provides accessible and effective **cooling-off tools** for players seeking to take a temporary break from gambling. Until such technical and platform adjustments as are required to implement this feature on the Company's platform are performed, the Company will provide this service manually via email communication with the players.

7.1.1. Availability and Accessibility

We offer players the option to activate a 24-hour, a 7-day, 1 month or 3-months cooling-off period, during which they are temporarily restricted from gambling.

The cooling-off feature is intended to assist players in managing their gambling behavior before it reaches problematic levels. It is offered as a **voluntary, self-activated, and non-negotiable** measure and is:

- Prominently displayed and easily accessible on the player's responsible gaming page / section
- Accessible via a **single-click button** without requiring additional steps, approval, or communication from customer support
- Available free of any influence, friction, or promotional content

Cooling-off may be selected by the player by any combination of one, more or all of the product verticals offered by the Company.

7.1.2. Immediate Activation and Restrictions

Once a player selects the cooling-off option:

- The player must be made aware of the **difference between Cooling Off period and Self-Exclusion** and must be offered the opportunity to proceed directly to Self-Exclusion if they so choose
- The restriction is **enforced immediately**, without delay or the need for confirmation
- The player's account is **temporarily locked** for the selected duration, preventing access to all gambling functionalities covered by the chosen scope
- The player must be given the option to **opt-out of all marketing communications** during the cooling-off period to minimize external gambling

triggers

The Company strictly **prohibits any interference** with the player's decision to take a break. This includes but is not limited to:

- Attempting to dissuade the player from proceeding or questioning their decision
- Offering incentives, bonuses, or rewards to continue gambling
- Delaying activation or requiring further justification

7.1.3. Reactivation and Additional Time-Out Options

After the cooling off period has expired, the player's account must be automatically reactivated, allowing them to resume gameplay without needing further action.

Records of the cooling-off request and duration are retained for internal compliance purposes.

7.2. Self-Exclusion

The Company is committed to offering effective tools to support players who wish to manage or pause their gambling activity. Self-exclusion is a critical component of the Responsible Gaming framework and serves to assist individuals at risk of gambling-related harm in regaining control of their behavior.

7.2.1. Self-Exclusion Process and Requirements

The Company shall maintain a **clearly defined, accessible, and documented self-exclusion program**, designed to take immediate effect upon a player's request and to remain non-reversible during the selected exclusion period.

A dedicated **Self-Exclusion Register** shall be maintained and include all self-excluded players. This register will be retained for a minimum of **seven (7) years** from the end date of the self-exclusion period.

To prevent circumvention of controls:

- All known **payment methods** linked to self-excluded accounts must be blocked during the exclusion period
- The Company has implemented **duplicate account detection procedures** to prevent re-registration under different credentials

7.2.2. Accessibility and Communication

Self-exclusion tools must be:

- **Prominently displayed** and easily accessible on the website's Responsible

Gaming page or within the appropriate player account section

- Fully available for **self-service activation**, without requiring operator approval, email correspondence, or customer support mediation (provided first-line personnel will be trained to assist players in setting self-exclusion if required)
- Communicated clearly, including step-by-step activation instruction, available duration options, explanation of the benefits of self-exclusion, guidance on additional resources or support organizations.

Information about self-exclusion must be clearly outlined:

- The steps required to self-exclude
- The duration options available
- The benefits of self-exclusion, including its role in preventing problem gambling

Players must be advised of the **difference between cooling-off and self-exclusion** and encouraged to select the most appropriate tool for their needs.

7.2.3. Immediate and Irreversible Action

Once submitted, a self-exclusion request shall:

- Take immediate effect
- **Restrict access** to all selected gambling verticals
- Be **non-reversible** before the end of the chosen exclusion period
- Extend to all domains operated by the Company under the same license
- Trigger **automatic removal** of the player from all marketing communications

Players must be able to initiate and complete the self-exclusion process fully online, without requiring email communication or operator approval. Self-exclusion steps must be concise and easy to understand, taking no more than 15 minutes to complete.

The Company must not engage in any activity that may discourage or delay the player's decision, including:

- Offering incentives or bonuses
- Asking for justification or challenging the request
- Imposing unnecessary technical or procedural delays

7.2.4. Self-Exclusion Periods and Restrictions

In accordance with Clause 5.4(2) of the LOK, operators must offer a long-term self-exclusion period of **1 year**, with additional options for **3 years, 5 years, 10 years, and lifetime exclusion**.

Self-exclusion may apply to **all verticals or specific game types**, as selected by the player (e.g., Slots, Table Games, Sports Betting, Poker, etc.).

A player who self-excludes must also be excluded from all the operator's domains and the player should be encouraged to self-exclude from other gambling sites.

7.2.5. Financial and Account Management

Upon activation of total self-exclusion of all verticals:

- All gambling access is suspended
- The player's account is locked for the duration of exclusion
- Any remaining balance (not frozen under AML policy) must be **refunded within two (2) business days** to the original payment method
- The player is permanently removed from marketing lists

Upon activation of self-exclusion of one or more (but not all verticals):

- Access and wagering are restricted in full for those products only
- The exclusion must be respected across any cross-vertical promotions or access pathways

7.2.6. Reactivation and Post-Exclusion Protocol

After a self-exclusion period ends:

- The Company will request the player to confirm in writing (including e-mail) their request before unblocking the account.
- The Company must:
 - Provide a Responsible Gaming reminder
 - Present **available safeguards** (limits, self-tests, etc.)
 - Encourage completion of a **self-assessment questionnaire**
- Accounts may only be reactivated under the **original credentials**
- Complete account history must be **preserved and reviewed**

7.2.7. Marketing and Contact Restrictions

During and after self-exclusion:

- The Company shall not contact the player for marketing or promotional purposes
- No free play, bonuses, or incentives may be offered

- Any communication must be **non-commercial in nature** (e.g., only the required third-party, legal or other non-marketing notices or confirmations are allowed)

Players will be informed by email about the end of cooling-off and self-exclusion periods. Cooling-off periods end automatically, while resumption of play post self-exclusion must be fully player-initiated.

7.2.8. Compliance and Regulatory Obligations

All actions and communications related to self-exclusion must be **documented in real time** and retained for audit purposes.

If a self-excluded individual or minor is found to have breached access controls:

- Any deposited funds (not otherwise frozen) must be **refunded within two (2) business days**
- The player's account must be **immediately suspended**
- A **detailed report** must be submitted to the CGA within **five (5) working days**, including:
 - How the breach occurred
 - Remedial actions taken
 - Future prevention measures

7.2.9. Operator-Initiated Exclusion

The Company reserves the right to **proactively exclude a player** in any of the following circumstances:

- Clear and severe signs of problem gambling behavior
- Suspected or confirmed involvement in illegal activity

All operator-initiated exclusions must be:

- Formally documented
- Retained for a minimum of **five (5) years**
- Made available to the CGA upon request

8. RG TOOLS - LIMITS

The Company provides players with various tools to control their gambling activity by setting limits. Players can set these limits for daily, weekly, or monthly periods, allowing them to tailor restrictions to their individual gaming habits. Players can make their limits more stringent at any time, and such changes take effect immediately. However, any request to ease a limit will be subject to a mandatory waiting period before taking effect, ensuring that decisions are made with due consideration.

8.1. Deposit Limits

Players can set limits on the total amount they deposit over a defined period (daily, weekly, or monthly). Once a deposit limit is reached, the player will not be able to deposit additional funds until the specified period resets.

The Company will not accept deposits from a player that exceed their self-imposed deposit limit.

8.2. Other Limits

The Company has implemented additional limits, which may be tweaked according to the target markets and real-world usage data:

Loss Limits: A loss limit restricts the amount of money a player can lose within a specific time period – a day, a week, or a month. Once the limit has been reached, no further bets will be accepted until the respective period lapses if such bets could potentially increase the loss. This limit encourages players to gamble within their means and avoid chasing losses.

Wager Limits: A wager limit is a cap on the amount of money players can bet or stake within a specific time period – a day, a week, or a month. Once the limit has been reached, no further bets will be accepted until the respective period lapses. This limit helps players control their spending by setting boundaries on how much they can wager.

Time Limits: Time limits control the amount of time a player can spend gambling in a single session or over a specified period.

8.3. Setting and Modifying Limits

Setting Limits: Players can set limits through their account settings. Limits take effect immediately upon being set.

Modifying Limits: Players may increase or revoke their limits through the same interface as used to set them. Any request to reduce a limit (make it more stringent) takes effect immediately. Requests to increase the limit (make it less stringent) are

subject to a **seven-day waiting period** before implementation. This waiting period ensures that decisions are made with due consideration and helps prevent impulsive changes that could lead to excessive gambling.

8.4. Exceptions for Limits and Exclusions

A limit or exclusion has the potential to affect active wagering – including, but not limited to:

- A time limit set when a player is active in a poker tournament
- A limit or exclusion when a player has an unresolved ante-poste bet on a future event

In these situations the restrictions as outlined above must be honored immediately with the exception of the active gameplay or wager(s). Upon completion of the relevant tournaments, wagers or events the restrictions apply.

8.5. Reality Check

Then Company shall consider, depending on real-life usage and other data, implementing reality checks, which may include one or several measures, for example (without limitation):

- A real-time session timer that remains visible at all times while the player is logged in
- Player-Activated reality check alerts at specific time intervals set by the player. When triggered, it requires the player to confirm that they have read the message before resuming play and offers the option to end the session or continue playing.

Player-Activated reality check must suspend play momentarily and require the player to confirm they have read the message by clicking on the appropriate button or by other means.

Custom messages may include information on how long the player has been playing and/or display the player's winnings and losses during that period.

9. ADDITIONAL MEASURES

While the previous sections outline our core responsible gaming strategies, the Company recognizes that a comprehensive approach to responsible gaming requires additional measures. This section details supplementary practices and policies that further support our commitment to creating a safe and responsible gaming environment.

9.1. Staff Training

Effective implementation of our responsible gaming policies relies heavily on well-trained staff. To this end, we have developed a training program for all relevant employees, affiliates, marketing partners, social media influencers.

Our responsible gaming training program covers a wide range of topics, including:

- Understanding problem gambling: signs, symptoms, and potential consequences
- The psychology of addiction and its relation to gambling
- Responsible gaming tools
- Legal and regulatory requirements related to responsible gaming
- The Company's specific policies and procedures as outlined in this document

Training should cover: - Recognizing signs of gambling distress (e.g., agitation, aggression, or financial desperation) - Conducting sensitive and structured conversations with at-risk players - Directing players to appropriate support resources and responsible gaming tools - Ensuring all interactions are documented for compliance and follow-up action

We may employ internal training sessions and/or external training programs commercially available from third parties.

9.2. Responsible Marketing Practices

The Company is committed to ensuring that all advertising and promotional activities are conducted responsibly, ethically, and in compliance with applicable CGA gaming regulations and Responsible Gaming standards.

The Company shall ensure that all marketing, promotional, and advertising activities adhere to responsible gaming principles. Direct marketing activities (including emails, messaging, bonuses or incentives) are prohibited during an active cooling off or self-exclusion period.

Advertising must not mislead, encourage excessive gambling, or target vulnerable individuals.

Additionally, the Company shall ensure that all business partners, including affiliates,

influencers (social media or otherwise), VIP representatives, and marketers, comply with the responsible gaming framework and applicable advertising regulations.

9.2.1. Advertising and Marketing Restrictions

The Company shall not engage in misleading, excessive, or irresponsible advertising. The following restrictions apply to all forms of marketing and advertising:

- No Aggressive or Misleading Tactics – Advertising must not be excessive, deceptive, or aggressive in nature.
- No Targeting of Vulnerable Groups – Marketing and promotions must not target or appeal to self-excluded players, individuals with gambling problems, minors, or financially vulnerable people.
- No Portrayal of Gambling as an Investment – Advertising must not promote gambling as a way to achieve financial success or solve financial difficulties.
- No Misrepresentation of Skill vs. Chance – Marketing must not suggest that skill can influence the outcome of games that are purely based on chance.
- No Emotional Manipulation – Advertising must not portray gambling as a means of escaping stress, depression, loneliness, or other personal struggles.
- No Child-Friendly Content – Cartoons, animations, and visuals that appeal to children or minors must not be used.
- Operators must not use social media influencers, celebrities, or entertainers who appeal to minors in any marketing campaign.
- Marketing materials must not feature minors or depict them engaging with gambling content.
- No Sexual or Explicit content – Adverts, messaging or any communications must not contain any overt sexual or pornographic imagery or suggestion.
- No Association with Unrelated Harmful Behaviors – There must be no linkage between gambling and smoking, drug use, alcohol consumption, seduction, or enhanced attractiveness.
- Bonus Conditions
 - Bonuses and promotions must be communicated transparently with clear terms and conditions.
 - Operators must not encourage excessive gambling through aggressive bonus promotions.

9.2.2. Responsible Gaming Commitments in Consumer Advertising

In addition to the mandatory measures listed above, the Company shall consider implementing one or several of the following regarding consumer advertising. These measures, where implemented, will be documented in the appropriate marketing policies / checklists:

- Responsible Gaming Messaging – All advertising, available space permitting, must include a clearly visible responsible gaming message or slogan.
- Offline Advertising – Regardless of the requirements of the CGA or the LOK, all advertising on any media or platform must adhere to the code of conduct of that media outlet that vis-a-vis responsible gambling messaging and practices.
- Online and Social Media
 - Operators must enforce clear guidelines to ensure online advertising does not target vulnerable groups.
 - All social media gambling advertisements must be age-gated and explicitly identified as content from a gambling operator.
- Direct Marketing – The operator must implement strict protocols to ensure that all direct marketing campaigns (emails, SMS, push notifications) emphasize responsible gambling and exclude self-excluded players or those who have set gaming limits.
- Affiliate Advertising – The operator is responsible for ensuring that all affiliates comply with responsible gaming standards. This must be enforced through binding contracts, compliance audits, and penalties for non-compliance.
- Social Media Influencers
 - The operator is responsible for all actions and statements of any social media influencer pertaining to the operator business, whether or not the influencers actions and/or statement are paid placement or advertisement.
 - Social Media Influencers representing the operator must be of-age, with a target audience that does not include vulnerable individuals (as defined above) and not be involved in sexually provocative activities.
- Sponsorships
 - Sponsorship agreements must not appeal to vulnerable individuals, particularly minors.
 - Operators must ensure that branding or promotional material does not appear on youth sports equipment or at events targeted at minors.
 - All sponsorship content should include responsible gambling messages.

9.3. Prohibition of Credit

The Company strictly prohibits the provision of credit for gambling purposes. This policy is designed to prevent customers from gambling with money they don't have, which can lead to financial difficulties and exacerbate problem gambling.

No Credit Provision: Under no circumstances does the Company provide credit to players or act as an agent for credit providers to facilitate the provision of credit for gambling purposes. This applies to all forms of credit, including:

- Direct loans
- Credit card cash advances
- Any form of deferred payment for gambling activities
- Any activities to present, promote, advertise or act on behalf of any credit schemes or similar financial instruments

Adequate Funds Requirement: Before accepting a bet or wager from a player, our systems automatically check to ensure there are adequate funds in the player's account to cover the amount of the bet or wager. If sufficient funds are not available, the bet or wager is not accepted.